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2004-13 ALT Asset-Backed Certificates, TMTS Series 2004-13ALT*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. BANK NATIONAL ASSOCIATION AS
TRUSTEE FOR TERWIN MORTGAGE
TRUST 2004-13 ALT, ASSET-BACKED
CERTIFICATES, TMTS SERIES 2004-
13ALT.

Case No.: 2:20-cv-02239-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
18-20]**

[Third Request]

Plaintiff.

VS

FIDELITY NATIONAL TITLE GROUP,
INC.; CHICAGO TITLE INSURANCE
COMPANY; TICOR TITLE OF NEVADA,
INC.; DOE INDIVIDUALS I through X; and
ROE CORPORATIONS XI through XX,
inclusive.

Defendants.

Plaintiff, U.S. Bank National Association as Trustee for Terwin Mortgage Trust 2004-13 ALT, Asset-Backed Certificates, TMTS Series 2004-13ALT (“U.S. Bank Trustee”), Specially-Appearing Defendant Fidelity National Title Group, Inc. (“Fidelity”), and Defendants Chicago Title Insurance Company (“Chicago Title”), and Ticor Title of Nevada, Inc. (“Ticor”, collectively “Defendants”), by and through their counsel of record, hereby stipulate and agree as follows:

- 1 2. On December 10, 2020, Chicago Title filed its Petition for Removal to this Court [ECF
2 No. 1];
3 3. On January 25, 2021, Defendants filed their Motions to Dismiss [ECF No. 18-20];
4 4. U.S. Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is currently
5 April 13, 2021;
6 5. U.S. Bank Trustee's counsel is requesting an extension until May 13, 2021, to file its
7 response to the pending Motions to Dismiss;
8 6. This extension is requested to allow U.S. Bank Trustee additional time to finalize and
9 file its response to the pending Motions to Dismiss as lead handling counsel for U.S.
10 Bank Trustee continues to recover from an unexpected medical emergency.
11 7. Counsel for Defendants does not oppose the requested extension;
12 8. This is the third request for an extension which is made in good faith and not for
13 purposes of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 9th day of April, 2021.

16 WRIGHT, FINLAY & ZAK, LLP

17 _____
18 /s/ *Lindsay D. Robbins*
19 Lindsay D. Robbins, Esq.
20 Nevada Bar No. 13474
21 7785 W. Sahara Ave., Suite 200
22 Las Vegas, NV 89117
23 *Attorneys for Plaintiff, U.S. Bank National
24 Association as Trustee for Terwin Mortgage
25 Trust 2004-13 ALT, Asset-Backed
26 Certificates, TMTS Series 2004-13ALT*

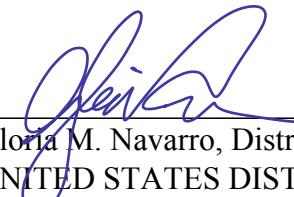
16 DATED this 9th day of April, 2021.

17 SINCLAIR BRAUN LLP

18 _____
19 /s/ *Kevin S. Sinclair*
20 Kevin S. Sinclair, Esq.
21 Nevada Bar No. 12277
22 16501 Ventura Boulevard, Suite 400
23 Encino, California 91436
24 *Attorney for Defendants, Fidelity National
25 Title Group, Inc., Fidelity National Title
26 Insurance Company, and Ticor Title of
27 Nevada, Inc.*

24 **IT IS SO ORDERED.**

25 Dated this 9 day of April, 2021

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Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT